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August 14, 2019

**Via ECF**

Honorable P. Kevin Castel, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street,  
New York, New York 10007

Application GRANTED. The initial pretrial conference is adjourned from September 10, 2019 to September 23, 2019 at 12:15 p.m.  
SO ORDERED.  
Dated: 8/15/2019

  
P. Kevin Castel  
United States District Judge

**Re: Textbroker Int'l, LLC. v. Chloe Skupnick, et al.**  
**Docket No. 19 cv 5608 (PKC)**  
**Initial Pretrial Conf.: 9/10/2019**

Dear Honorable Sir:

Our Firm represents the defendants David Thelin and Nicole Thelin in the above-referenced action. This letter is a formal request for an additional 15 days to respond to the plaintiff's Complaint. Currently, the defendants must respond to the Complaint on or before August 19, 2019.

It is requested that defendants David Thelin and Nicole Thelin's time to answer or make any motion in response to the Complaint be extended to and including September 3, 2019. The additional time is being sought to allow recently retained counsel to collect the appropriate documentation from the defendants, who live in Utah, and investigate this matter so we can submit the proper response on their behalf. These defendants have made no prior request for an extension. Plaintiff's counsel, Andrew Solomon, Esq., consented to the instant request for a 15-day extension of time to respond.

In addition, under Judge Castel's Individual Practices, section 1B, it is requested that the initial pretrial conference scheduled for September 10, 2019, be adjourned to a date at least 14 days after the required response date.

For the above reasons, defendants David Thelin and Nicole Thelin respectfully seek an order granting their request to extend their time to respond to the Complaint through September 3, 2019, and an adjournment of the initial conference.

Thank you for your time and consideration.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Peter W. Yoars, Jr.", with a long horizontal flourish extending to the right.

Peter W. Yoars, Jr.

cc: Andrew Solomon, Esq. (ECF only)  
Chloe Skupnick